

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ALEXANDER REENTS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 23-cv-14917
	)	District Judge: Hon. Martha M. Pacold
PUBLIC WIRELESS, LLC,	)	Magistrate: Hon. Holleb Hotaling
	)	
Defendant.	)	

**JOINT MOTION TO ENTER AGREED CONFIDENTIALITY ORDER**

Plaintiff Alexander Reents, (“Plaintiff”), and Defendant Public Wireless, LLC (“Defendant”) (collectively, the “Parties”) hereby jointly request that the Court approve and adopt the proposed Agreed Confidentiality Order, and state as follows:

1. This matter involves the exchange of discovery, which is expected to include sensitive internal files, policies and other information maintained by Defendant as confidential, as well as documents that may contain personally identifying information, financial information and/or health information of non-party clients and prospective clients.

2. The Parties have agreed upon a proposed Confidentiality Order to protect this information while permitting necessary discovery, which is submitted contemporaneously pursuant to the Court’s local rules and procedures, and which generally tracks the Model Order.

3. The Parties therefore respectfully request entry of the agreed proposed Confidentiality Order to facilitate discovery.

WHEREFORE, the Parties respectfully request that this motion be granted and that the agreed proposed Confidentiality Order be entered.

Dated: January 23, 2024

PLAINTIFF,  
By his attorneys:

/s/ Anthony I. Paronich (w/consent)

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DEFENDANT,  
By its attorneys:

/s/ Laura E. Schrick

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